

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

NORMA ROGERS, ET AL.,)	
)	
Plaintiffs,)	
)	
v.)	No. 6:19-cv-3346 RK
)	
DOUGLAS GASTON, ET AL.,)	
)	
Defendants.)	

**Consent Motion to Drop Jennifer Tomaszewski as Defendant
for Count IV of Third Amended Complaint**

Pursuant to Federal Rule of Civil Procedure 21, Plaintiffs request this Court enter an order dropping Jennifer Tomaszewski as a defendant with respect to Count IV of the third amended complaint. In support, they state:

1. On May 4, 2021, Plaintiffs filed their third amended complaint. ECF No. 154.
2. The third amended complaint names Tomaszewski as a defendant for Counts I-V of the six-count pleading. *Id.*
3. Tomaszewski has not filed an answer.
4. “On motion or on its own, the court may at any time, on just terms, add or drop a party.” Fed. R. Civ. P. 21.
5. Plaintiffs ask this Court to drop Tomaszewski as a defendant for Count IV and dismiss her from this case with respect to Count IV only, such that Tomaszewski will remain a defendant as to Counts I, II, III, and V.
6. Tomaszewski’s counsel has advised that Plaintiffs may indicate her consent to this request.

WHEREFORE Plaintiffs request this Court enter an order dropping Jennifer Tomaszewski as a defendant with respect to Count IV only of the third amended complaint.

Respectfully submitted,

/s/ Anthony E. Rothert

Anthony E. Rothert, #44827

Jessie Steffan, #64861

Kayla DeLoach, #72424

Molly Carney, #70570

ACLU of Missouri Foundation

906 Olive Street, Suite 1130

St. Louis, Missouri 63101

arothert@aclu-mo.org

jsteffan@aclu-mo.org

kdeloach@aclu-mo.org

mcarney@aclu-mo.org

Tel. (314) 652-3114

Fax: (314) 652-3112

Gillian R. Wilcox, # 61278

ACLU of Missouri Foundation

406 W. 34th Street, Suite 420

Kansas City, Missouri 64111

gwilcox@aclu-mo.org

Tel. (816) 470-9938

Fax: (314) 652-3112

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion was served on opposing counsel by the electronic filing system on June 24, 2021.

/s/ Antony E. Rothert